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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) No. CR 11-0625 EMC  
Plaintiff, )  
v. )  
BASSAM YACOUB SALMAN )  
a/k/a Bassam Jacob Salman, )  
Defendant. )  
\_\_\_\_\_  
) STIPULATION AND [PROPOSED]  
) ORDER EXCLUDING TIME

WHEREAS, on October 26, 2011, the United States produced approximately 937,000 pages of documents and other materials to counsel for the defendant;

WHEREAS, counsel for the defendant needs time to review the discovery;

24 WHEREAS, the Court held a status conference on May 9, 2012, and set this case for trial  
25 on March 4, 2013;

WHEREAS, in an order dated May 23, 2012, and with the consent of the defendant, the Court concluded that the exclusion of time from May 9, 2012, to March 4, 2013, should be made under 18 U.S.C. § 3161(h)(7)(B)(iv);

STIP. & [PROPOSED] ORDER EXCLUDING TIME  
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WHEREAS, on December 19, 2012, the Court reset the trial date to March 18, 2013, and set a pre-trial conference on February 26, 2013;

WHEREAS, a failure to grant the continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and under the circumstances, the ends of justice served by a reasonable continuance outweigh the best interest of the public and the defendant in a speedy trial;

WHEREAS, the defendant consents to the exclusion of time from December 19, 2012, to February 26, 2013;

THEREFORE, it is hereby stipulated by and between the parties, through their respective counsel of record, that the period of time from December 19, 2012, to February 26, 2013, shall be excluded in computing the time within which the trial of the offenses alleged in the Indictment must commence under 18 U.S.C. § 3161.

DATED: January 2, 2013

MELINDA HAAG  
United States Attorney

ROBERT S. LEACH  
ADAM A. REEVES  
Assistant United States Attorneys

DATED: January 2, 2013

GAIL SHIFMAN, ESQ.  
Law Offices of Gail Shifman

/s/  
**GAIL SHIFMAN, ESQ.**  
Counsel to Defendant Bassam Salman

## **ORDER EXCLUDING TIME**

Pursuant to stipulation, it is HEREBY ORDERED as follows:

The Court finds that the ends of justice served by granting a continuance from December 19, 2012, to February 26, 2013, outweigh the best interests of the public and the defendant in a

1      speedy trial. The Court ORDERS that the time between December 19, 2012, and February 26,  
2      2013, shall be excluded in computing the time within which the trial must commence under the  
3      Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) & (B)(iv).

4      DATED: January 3, 2013

